

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

IN RE: VALSARTAN PRODUCTS LIABILITY
LITIGATION

This Document Relates To:

All Actions

Hon. Robert. B. Kugler

Civ. No. 19-2875 (RBK/JS)

**PLAINTIFFS' NOTICE OF VIDEOTAPED DEPOSITION
PURSUANT TO FED. R. CIV. P. 30(b)(6)**

TO: Jessica M. Heinz
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PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiffs will take the deposition upon oral examination of a designated corporate representative(s) with regard to the topics addressed in the document requests attached as Exhibit A, including but not limited to Aurobindo Pharma USA, Inc.'s and Aurolife Pharma, LLC's access to and possession, custody, and control of documents and other relevant materials and information of Aurobindo Pharma Limited. The deposition will commence on a date to be determined, at 9:00 a.m., at a location to be determined, and continue from day to day as needed.

Defendant is also requested to produce the documents requested on Exhibit A hereto, at least 20 days prior to the deposition.

The deposition(s) will be taken upon oral examination before an officer authorized to administer oaths and will continue from day to day, until completed. Testimony given during the deposition will be recorded by sound video recording and stenographic means.

DATED this 10th day of September 2019.

MAZIE SLATER KATZ & FREEMAN, LLC

By: /s/ Adam M. Slater
Adam M. Slater
103 Eisenhower Parkway, Suite 207
Roseland, New Jersey 07068
Telephone: 973-228-9898

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Adam M. Slater, hereby certify that on September 10, 2019, I caused true and correct copies of the foregoing to be transmitted via ECF to all counsel having registered an appearance on ECF, with courtesy copies served on defense counsel for Aurobindo Pharma USA, Inc. and Aurolife Pharma, LLC, and defendants' liaison counsel, via email.

DATED this 10th day of September 2019.

MAZIE SLATER KATZ & FREEMAN, LLC

By: /s/ Adam M. Slater
Adam M. Slater
103 Eisenhower Parkway, Suite 207
Roseland, New Jersey 07068
Telephone: 973-228-9898

Attorneys for Plaintiffs

EXHIBIT A

Note: Unless otherwise indicated, the relevant time period for all requests is January 1, 2010 to the present.

1. Documentation demonstrating the corporate relationship and organization, including but not limited to ownership, control, parent/subsidiary relationship, and agency relationship, as between and among Aurobindo Pharma USA, Inc., Aurolife Pharma, LLC, and Aurobindo Pharma Limited.
2. All contracts and agreements, including but not limited to those addressing ownership, control, parent/subsidiary relationship, and agency relationship, between and among Aurobindo Pharma USA, Inc., Aurolife Pharma, LLC, and Aurobindo Pharma Limited.
3. All policies and procedures addressing (1) the corporate relationship, including but not limited to ownership, control, parent/subsidiary relationship, and agency relationship, and (2) communications and access to information, between and among Aurobindo Pharma USA, Inc., Aurolife Pharma, LLC, and Aurobindo Pharma Limited.
4. All communications between and among employees, agents, directors, or officers of Aurobindo Pharma USA, Inc., Aurolife Pharma, LLC, and Aurobindo Pharma Limited, requesting or providing information with regard to the manufacture, production process, regulatory compliance, testing, and contamination of valsartan.
5. All communications between and among employees, agents, directors, or officers of Aurobindo Pharma USA, Inc., Aurolife Pharma, LLC, and Aurobindo Pharma Limited, with regard to communications with the FDA regarding the manufacturing process or contamination of valsartan.
6. Complete documentation of communications between and among employees, agents, directors, or officers of Aurobindo Pharma USA, Inc., Aurolife Pharma, LLC, and Aurobindo Pharma Limited, with regard to the conduct and results of testing of valsartan for contamination.
7. Complete documentation of communications between and among employees, agents, directors, or officers of Aurobindo Pharma USA, Inc., Aurolife Pharma, LLC, and Aurobindo Pharma Limited, with regard to any change or modification to the manufacturing process for valsartan.
8. All documents in the possession, custody, or control of Aurobindo Pharma USA, Inc. and/or Aurolife Pharma, LLC, with regard to:
 - a) Contamination of valsartan,
 - b) Communications with the FDA with regard to potential or actual contamination of valsartan,
 - c) The valsartan manufacturing process, including any changes or modifications thereto (including but not limited to the use of solvents),
 - d) The conduct and results of testing of valsartan for impurities or contamination,
 - e) The health risks posed by the valsartan contamination,
 - f) The ANDAs and other regulatory filings and communications with regard to valsartan, and
 - g) Sales and pricing of valsartan sold in the United States.

9. All documents that Aurobindo Pharma USA, Inc. and/or Aurolife Pharma, LLC have access to, with regard to:
 - a) Contamination of valsartan,
 - b) Communications with the FDA with regard to potential or actual contamination of valsartan,
 - c) The valsartan manufacturing process, including any changes or modifications thereto (including but not limited to the use of solvents),
 - d) The conduct and results of testing of valsartan for impurities or contamination,
 - e) The health risks posed by the valsartan contamination,
 - f) The ANDAs and other regulatory filings and communications with regard to valsartan, and
 - g) Sales and pricing of valsartan sold in the United States.
10. Complete documentation of any request(s) by Aurobindo Pharma USA, Inc. and/or Aurolife Pharma, LLC for documents or information to be provided by Aurobindo Pharma Limited with regard to valsartan, to which Aurobindo Pharma Limited has refused or denied access.
11. Document/data retention and destruction policies for Aurobindo Pharma USA, Inc., Aurolife Pharma, LLC, and Aurobindo Pharma Limited.
12. All Aurobindo Pharma USA, Inc. or Aurolife Pharma, LLC corporate meeting agendas, minutes, and exhibits thereto reflecting participation of or reference to any employee, agent, officer, or director of Aurobindo Pharma Limited with regard to valsartan.
13. Documentation sufficient to identify all persons who are or were employees, agents, officers, or directors of both Aurobindo Pharma USA, Inc. or Aurolife Pharma, LLC as well as employees, agents, officers, or directors of Aurobindo Pharma Limited.